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March 10, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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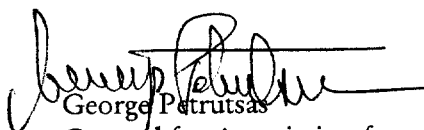
Magalie Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-B204  
Washington, D.C. 20554

Re: Norcom Communications Corporation, et al.  
WTB Docket No. 98-181

Dear Ms. Salas:

On behalf of the Association for East End Land Mobile Coverage, LMR 900 Association of Suffolk, and NY LMR Association, Inc., are an original and six (6) copies of their Joint Motion for Extension of Time in the above-referenced proceeding.

Yours very truly,



George Petrutsas  
Counsel for Association for  
East End Land Mobile Coverage  
LMR 900 Association of Suffolk  
NY LMR Association, Inc.

GP:deb

Enclosures

cc: See Service List

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Before the  
**Federal Communications Commission**  
Washington DC 20554

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**MAR 19 1999**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matters of

NORCOM COMMUNICATIONS CORPORATION  
ASS'N FOR EAST END LAND MOBILE COVERAGE  
LMR 900 ASSOCIATION OF SUFFOLK  
METRO NY LMR ASSOCIATION  
NY LMR ASSOCIATION  
WIRELESS COMM. ASSOCIATION OF SUFFOLK COUNTY

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WTB Docket No. 98-181

TO: Hon. Administrative Law Judge John M. Frysiak

**JOINT MOTION FOR EXTENSION OF TIME**

The Association for East End Land Mobile Coverage, LMR 900 Association of Suffolk, and NY LMR Association, ("Associations"), by counsel and pursuant to Sections 1.323(b) and 1.325(a)(2) of the rules and regulations of the Federal Communications Commission, hereby move the Presiding Judge to extend the period within which the Associations must respond to the Wireless Telecommunications Bureau's first set of interrogatories and to its request for production of documents until March 26, 1999. In support of the Motion, the following is respectfully submitted.

First, although service of the Bureau's discovery requests may have commenced on February 26, 1996, as stated therein, the documents were in fact mailed on March 1, 1999, and were received at counsel's offices on March 3, 1999. Neither counsel nor

the Associations have received the facsimile copies of the documents. The time remaining is not adequate to conduct the research needed and to prepare responses to the large number of detailed interrogatories and to locate and produce the large number of documents requested. Some of the information and documents requested relate to events going back to 1990 and prior thereto. Association personnel, the Executive Officers, are employed elsewhere and cannot devote full time and attention to responding to the Bureau's discovery requests. In light of these factors, the additional time requested is absolutely necessary for the Associations to respond adequately to the Bureau's requests.

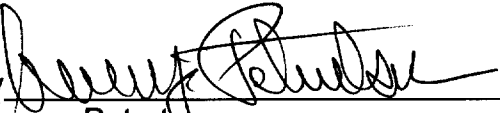
As noted in the Motion of Norcom Communications, the Associations have also conducted settlement negotiations with the Bureau and have offered settlement proposals which, if accepted, would obviate the need for further proceedings in this case. In light of the ongoing settlement negotiations, it would be unreasonably burdensome to the Associations to undertake the effort required to respond to the Bureau's extensive discovery at this time and, therefore, the Associations reserve the right to request a further extension if the settlement negotiations continue and appear promising.

WHEREFORE, the promises considered, the Associations request the Presiding Judge to grant this Motion and extend the period within which they must respond to the Bureau's first set of interrogatories and its request for production of documents to and

including March 26, 1999. Bureau counsel has advised the undersigned counsel that the Bureau would not object to the grant of an extension until March 19, 1999.

Respectfully submitted,

ASSOCIATION FOR EAST END LAND  
MOBILE COVERAGE  
LMR 900 ASSOCIATION OF SUFFOLK  
METRO NY LMR ASSOCIATION  
NY LMR ASSOCIATION  
WIRELESS COMM. ASSOCIATION OF  
SUFFOLK COUNTY

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LMR 900 ASSOCIATION OF SUFFOLK  
NY LMR ASSOCIATION

March 9, 1999

Certificate of Service

I, Deborah N. Lunt, a secretary with the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 10th day of March, 1999, I caused copies of the foregoing "Joint Motion for Extension of Time" to be delivered by facsimile and first-class mail, postage prepaid, to the following:

The Honorable John M. Frysiak\*  
Administrative law Judge  
Federal Communications Commission  
445 12th Street, SW  
Room 1-C861  
Washington, DC 20554

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Judy Lancaster  
Wireless Telecommunications Bureau  
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\*Via Facsimile and Hand Delivery